

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

In re FEDERATED MUTUAL FUNDS) **Electronically Filed**
EXCESSIVE FEE LITIGATION) Consolidated Civ. Action No. 04-352-DSC
_____)

AGREED MOTION FOR AN EXTENSION OF PRE-TRIAL DEADLINES

By this agreed motion, Defendants respectfully request that the Court extend the pre-trial deadlines set forth in the Court's orders of May 1, 2008, March 27, 2009 and August 3, 2009. In support of their motion, Defendants state the following:

1. As reported at the November 3, 2009 status conference, the parties met and conferred and agreed upon a two-month extension of the existing Case Management Order in order to provide time for the parties to address discovery issues and to engage in settlement negotiations.

2. The parties, therefore, request that the Court extend the deadlines set forth in its orders of May 1, 2008, March 27, 2009 and August 3, 2009, as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Extended Deadline</u>
Expert Depositions	November 20, 2009	January 20, 2010
Pre-trial Stipulation	December 18, 2009	February 18, 2010
Plaintiffs' Pre-Trial Narrative Statement	January 19, 2010	March 19, 2010
Plaintiffs' Proposed Findings of Fact and Law and Pre-trial Brief	January 19, 2010	March 19, 2010
Defendants' Pre-trial Narrative Statement	February 19, 2010	April 19, 2010
Defendants' Proposed Findings of Fact and Law and Pre-trial Brief	February 19, 2010	April 19, 2010
Dispositive Motions	March 19, 2010	May 19, 2010

3. The parties further stipulate that they will hold a settlement conference without a mediator on November 17, 2009, at the offices of Reed Smith in Pittsburgh, Pennsylvania. After the conclusion of the settlement negotiations, the parties will report to the Court as to the status of those discussions.

4. In addition, Defendants have agreed to provide Plaintiffs with minutes of the general session meetings of the board of directors for the Federated Funds, redacted solely for attorney client privilege or attorney work product communications, by November 11, 2009, and to provide Plaintiffs with the additional documents they have agreed to produce, other than those covered by third party confidentiality agreements, by December 3, 2009.

WHEREFORE, Defendants respectfully request the Court enter the attached proposed order extending the pre-trial deadlines set forth in the Court's orders of May 1, 2008, March 27, 2009 and August 3, 2009.

Dated: November 9, 2009

Respectfully submitted,

REED SMITH LLP

By: /s/ Joseph E. Culleton

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Agreed Motion for An Extension of Pre-Trial Deadlines was filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Dated: November 9, 2009

Respectfully submitted,

REED SMITH LLP

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